



May 21, 2010

Mr. Andrew Crabtree, Principal Planner  
Planning, Building and Code Enforcement  
San Jose City Hall  
200 East Santa Clara Street  
San Jose, CA 95113

Re: Comments on San Jose's Protected Intersection Policy

Dear Mr. Crabtree:

Greenbelt Alliance supports the efforts by San Jose planning and transportation staff in crafting the Protected Intersection Policy to improve multi-modal transportation infrastructure in the City's Special Planning Areas. Working within the auto-oriented Level of Service framework, the Protected Intersection Policy incorporates important mitigation measures to accommodate non-vehicular modes of travel to streets reaching their designed capacity. Greenbelt Alliance encourages the City to amend the proposed policy to provide expanded opportunities to support walkable streets, safe bicycle access and enhanced transit accessibility.

The following recommendations are intended to leverage City policy and capitalize on development impact fees to bolster multi-modal transportation options:

1. **Expansion of Protected Intersections.** The default policy in all Planned and Identified Growth Areas should be that *every* intersection should fall under the protected intersection policy. Rather than having to explicitly designate Protected Intersections one by one as exceptions to the traditional Level of Service (LOS) approach, San Jose should make the Protected Intersections approach the rule, and traditional Level of Service the exception (see recommendation 2 below). Specifically:
  - a. Every intersection in Planned and Identified Growth Areas should be allowed to exceed automobile Level of Service D, and
  - b. Every project in Planned and Identified Growth Areas should construct improvements to the city's non-auto transportation system, rather than expand road capacity at a given intersection, regardless of the current LOS at that intersection (e.g. even intersections that currently operate at LOS A, B, or C should not be expanded if a new project will cause their LOS to deteriorate).
2. **Exemptions from Protected Intersections Policy.** The city should then also conduct a street typology assessment in Planned and Identified Growth Areas, similar to the one

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conducted in Seattle, to determine the relative priority of travel modes on each street – which streets give top priority to pedestrians, which to bicyclists, which to transit, and which to cars. Those intersections that involve streets that give top priority to the auto as a travel mode can then be considered on a case-by-case basis for potential exemption from the Protected Intersection Policy and a return to the traditional Level of Service approach.

3. **Improvements Funded by Protected Intersections Policy.** If a proposed development project would cause a significant LOS impact at a Protected Intersection, the proposed development must include construction of specific improvements *to enhance non-auto travel modes*. Funds raised through the Protected Intersections policy should not be used to make improvements to enhance automobile travel. Roadway expansions should only be permitted to add dedicated lanes for transit (e.g. bus rapid transit).

The Community Improvement Zones for where improvements can be made should be expanded appropriately to incorporate the areas surrounding the Planned and Identified Growth Areas. The City should work with the Strong Neighborhoods Initiatives groups to help communities identify neighborhood needs for improvements to the bicycle, pedestrian, and transit networks.

4. **Exemptions on infill projects.** When a project falls under the Protected Intersections Policy, only projects that do not create any new vehicle trips as a result of their construction should be exempt from the policy. The City should not limit the extent of the policy by setting minimum requirements on building footprint to trigger a protected intersection, but instead take full advantage of the policy to develop the necessary upgrades for a multi-modal streetscape.

Greenbelt Alliance applauds the work San Jose is already doing to design a City for people by including strong policy language in the Draft General Plan that promotes walking, cycling and riding transit. While Transportation LOS is no longer on the agenda for the May 24<sup>th</sup> Task Force meeting, we strongly encourage that the above additions to the Protected Intersections Policy be included in the General Plan. This will go a long way in helping San Jose achieve a 40% reduction in Vehicle Miles Traveled by 2040- a critical component to reducing the City's carbon footprint.

Sincerely,



Michele Beasley  
Senior Field Representative